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9 Attorneys for Defendant
10 NISSAN NORTH AMERICA, INC.

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 GERARDO CRUZ,
14
15 Plaintiff,
16 v.

17 NISSAN NORTH AMERICA, INC., a
18 Delaware Corporation, and DOES 1
19 through 10, inclusive,
20 Defendants.
21

CASE NO. 2:23-cv-02505-SSC

*Assigned to the Hon. Stephanie S.
Christensen*

[PROPOSED] JUDGMENT

Action Filed: March 3, 2023

~~PROPOSED~~ JUDGMENT

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff GERARDO CRUZ (“Plaintiff”) accepted Defendant Nissan North America, Inc.’s (“Nissan”) Offer of Judgment to Fed. R. Civ. P. 68.

1. Accordingly, the Court enters JUDGMENT in favor of Plaintiff in the amount of \$55,901.60 pursuant to the terms of the Rule 68 Offer. Nissan shall pay this amount within 30 days of Notice of Entry of Judgment.

2. Plaintiff shall reserve the right to petition the Court for an award of reasonably and actually incurred attorney fees and costs recoverable pursuant to California Code of Civil Procedure Section 1794(d). Any such motion shall be filed no later than 14 days after entry of judgment. In ruling on Plaintiff’s fee/cost motion(s), the attorneys’ fees, expenses, and costs amount shall be calculated as if Plaintiff was found to have prevailed in this action under section 1794(d) of the California Code of Civil Procedure as of the date of this offer of judgment. Nissan expressly reserves all defenses to Plaintiff’s fee/costs motion(s) and any award thereon. Nissan will pay the amounts determined by the Court within 30 days after entry of the award unless either party has filed a notice of appeal.

DATED: June 16, 2025



THE HONORABLE STEPHANIE S. CHRISTENSEN
UNITED STATES MAGISTRATE JUDGE